

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
GARY L. HALLING, Cal. Bar No. 66087
3 MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524
Four Embarcadero Center, 17th Floor
4 San Francisco, California 94111-4106
Telephone: 415-434-9100
5 Facsimile: 415-434-3947
Email: ghalling@sheppardmullin.com
6 Email: mscarborough@sheppardmullin.com

7 KING & BALLOW
ALAN L. MARX (admitted *pro hac vice*)
8 STEVEN C. DOUSE (admitted *pro hac vice*)
1100 Union Street Plaza
9 315 Union Street
Nashville, Tennessee 37201
10 Telephone: 615-259-3456
Facsimile: 615-726-5413
11 Email: amarx@kingballow.com
Email: sdouse@kingballow.com

12 Attorneys for Defendants
13 MEDIANEWS GROUP, INC. and
CALIFORNIA NEWSPAPERS PARTNERSHIP

14 [Additional counsel listed on signature pages]

15 UNITED STATES DISTRICT COURT
16
17 NORTHERN DISTRICT OF CALIFORNIA
18
19 SAN FRANCISCO DIVISION

19 CLINTON REILLY,

20 Plaintiff,

21 v.

22 MEDIANEWS GROUP, INC.; THE
HEARST CORPORATION; STEPHENS
23 GROUP INC.; GANNETT CO., INC.; and
CALIFORNIA NEWSPAPERS
24 PARTNERSHIP,

25 Defendants.

Case No. 06-CV-04332-SI

[Complaint Filed: July 14, 2006]

STIPULATION TO DISMISSAL WITH
PREJUDICE PURSUANT TO
RULE 41(a)(1) OF THE FEDERAL
RULES OF CIVIL PROCEDURE;
STIPULATION AND [PROPOSED]
ORDER VACATING PRELIMINARY
INJUNCTION AS MOOT

Judge: Hon. Susan Illston

Trial Date: April 30, 2007

1 All parties to this action hereby stipulate and agree, pursuant to Rule 41(a)(1)
2 of the Federal Rules of Civil Procedure, to the dismissal with prejudice of this action in its
3 entirety.

4 All parties to this action hereby further stipulate and agree that, in light of the
5 dismissal of this action prior to trial and the rescission by Hearst Corporation and
6 MediaNews Group, Inc. of the subject April 26, 2006 Letter Agreement pursuant to
7 settlement, the preliminary injunction entered in this case on December 19, 2006,
8 enjoining defendants from entering agreements of the nature described in the April 26,
9 2006 letter "pending trial", is moot and is vacated.

10 This Stipulation shall not affect the Stipulation and Protective Order for
11 Confidential Information filed September 13, 2006, in this case.

12
13 IT IS SO STIPULATED AND AGREED.

14
15 Dated: April 25, 2007

16 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
17 KING & BALLOW

18
19 By /S/
20 GARY L. HALLING

21 Attorneys for Defendants
22 MEDIANEWS GROUP, INC. and
23 CALIFORNIA NEWSPAPERS PARTNERSHIP
24
25
26
27
28

1 Dated: April 25 2007

2
3 LATHAM & WATKINS LLP
4 GREGORY P. LINDSTROM
5 DANIEL M. WALL
6 505 Montgomery Street, Suite 2000
7 San Francisco, CA 94111-2562
8 Telephone: (415) 391-0600
9 Facsimile: (415) 391-8095
10 Email: gregory.lindstrom@lw.com
11 Email: dan.wall@lw.com

12 By



DANIEL M. WALL

Attorneys for Defendant
THE HEARST CORPORATION

13 Dated: April __, 2007

14 NIXON PEABODY LLP
15 GORDON L. LANG (admitted *pro hac vice*)
16 401 9th Street, N.W.
17 Washington, D.C. 20004-2128
18 Telephone: (202) 585-8319
19 Facsimile: (202) 585-8080
20 Email: glang@nixonpeabody.com

21 NIXON PEABODY LLP
22 JOHN H. RIDDLE
23 Two Embarcadero Center, Suite 2700
24 San Francisco, CA 94111-3996
25 Telephone: (415) 984-8200
26 Facsimile: (415) 984-8300
27 Email: jriddle@nixonpeabody.com

28 By

GORDON L. LANG

Attorneys for Defendants
GANNETT CO., INC. and
STEPHENS GROUP, INC.

1 Dated: April __, 2007

2 LATHAM & WATKINS LLP
3 GREGORY P. LINDSTROM
4 DANIEL M. WALL
5 505 Montgomery Street, Suite 2000
6 San Francisco, CA 94111-2562
7 Telephone: (415) 391-0600
8 Facsimile: (415) 391-8095
9 Email: gregory.lindstrom@lw.com
10 Email: dan.wall@lw.com

11 By

DANIEL M. WALL

12 Attorneys for Defendant
13 THE HEARST CORPORATION

14 Dated: April 25, 2007

15 NIXON PEABODY LLP
16 GORDON L. LANG (admitted *pro hac vice*)
17 401 9th Street, N.W.
18 Washington, D.C. 20004-2128
19 Telephone: (202) 585-8319
20 Facsimile: (202) 585-8080
21 Email: glang@nixonpeabody.com

22 NIXON PEABODY LLP
23 JOHN H. RIDDLE
24 Two Embarcadero Center, Suite 2700
25 San Francisco, CA 94111-3996
26 Telephone: (415) 984-8200
27 Facsimile: (415) 984-8300
28 Email: jriddle@nixonpeabody.com

By


GORDON L. LANG

Attorneys for Defendants
GANNETT CO., INC. and
STEPHENS GROUP, INC.

1 Dated: April 25, 2007

2 ALIOTO LAW FIRM
3 JOSEPH M. ALIOTO
4 JOSEPH M. ALIOTO, JR.
5 THOMAS P. PIER
6 555 California Street, Suite 3160
7 San Francisco, CA 94104
8 Telephone: (415) 434-8900
9 Facsimile: (415) 434-9200

10 GRAY, PLANT, MOOTY, MOOTY & BENNETT, P.A.
11 DANIEL R. SHULMAN
12 500 IDS Center, 80 South Eighth Street
13 Minneapolis, MN 55402
14 Telephone: (612) 632-3335
15 Facsimile: (612) 632-4335

16 By

 /MWS

17 JOSEPH M. ALIOTO
18 DANIEL R. SHULMAN

19 Attorneys for Plaintiff
20 CLINTON REILLY

21 **ORDER**

22 IT IS SO ORDERED.



23 Dated: _____

24 HON. SUSAN ILLSTON
25 UNITED STATES DISTRICT COURT JUDGE